

REMARKS

Claims 1-3, 5-12, and 14-24 are pending in the Application.

Claims 1-3, 5-12, and 14-24 stand rejected.

Claims 1-3, 5, 10-12, 14, 19, and 20 have been amended. No new matter has been added. Support for the amendments to Claims 1, 10, and 19 can be found, at least, within paragraphs [0013]-[0016] of the originally-filed Specification. The amendments to Claims 2, 3, 5, 11, 12, 14, and 20 have been made for consistency on the independent claims on which they respectively depend. Further support for the amendments to Claims 5 and 14 is drawn from previous versions of Claims 1, 4, 10, and 13.

Rejection of Claims under 35 U.S.C. §112

Claims 5-9, 14-18 and 24 stand rejected under 35 U.S.C. 112, second paragraph, as purportedly being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Applicants have amended Claims 5, 9, 14, 18, and 24 to correctly provide sufficient antecedent basis. Applicants respectfully submit that Claims 5-9, 14-18, and 24 have now overcome this rejection.

Rejection of Claims under 35 U.S.C. §103(a)

Claims 1-3, 5-9, 10-12 and 14-24 stand rejected under 35 U.S.C. 103(a) as purportedly being unpatentable over U.S. Patent Application Publication No. 2003/0229529 A1 naming Mui et al. ("Mui") in view of U.S. Patent No. 6,385,620 issued to Kurzius ("Kurzius") and further in view of U.S. Patent No. 7,099,350 issued to Peterson ("Peterson"). Applicants respectfully traverse this rejection.

Amended independent Claim 1:

extracting, using the computing system, information in a first form, wherein
the first form is associated with a source system, and
the information in the first form comprises employee position data;
converting, using the computing system, the information in the first form into
information in an intermediate form, wherein
the information in the intermediate form is configured to allow the
employee position data to be imported into an employee position
field;
converting, using the computing system, the information in the intermediate form
into information in a target form, wherein
the target form is associated with a target system, and
the information in the target form comprises the employee position field;
and
importing the employee position data into the employee position field.

(Emphasis added).

Independent Claims 10 and 19 recite comparable limitations. Applicants respectfully submit that none of the cited references, alone or in any combination, teach or suggest, at the very least: (1) information in a first form comprising employee position data; (2) information in an intermediate form configured to allow the employee position data to be imported into an employee position field; (3) information in the target form comprises the employee position field; and (4) importing the employee position data into the employee position field.

Amended independent Claims 1, 10, and 19 recite new limitations not found within the cited sections of Mui, Kurzius, or Peterson. Further, Applicants respectfully submit that an ordinary artisan would be unable to extrapolate from the cited references to arrive at the claimed invention, and for purposes of this discussion, the amended claims, in particular.

The limitations that Kurzius was introduced to purportedly teach have now been removed from Claims 1, 10, and 19. Thus, Applicants respectfully submit that Kurzius is no longer applicable for teaching or suggesting any of the limitations of Claims 1, 10, and 19 (or any of the other claims, for that matter).

Mui pertains to a method for enterprise workforce planning and the Office Action cites a portion of Mui explaining how Mui's system purportedly encompasses the integration of disparate business applications systems. Office Action, p. 3, citing Mui, ¶¶ [0003] and [0123].

However, this analogy fails to account for any number of the recited limitations, and, in particular, the newly-added limitations. These limitations recite, in pertinent part, the manner in which employee position data within information in a first form is imported from a source system into an employee position field within information in a target form in a target system. This importing is achieved via an intermediate form configured to allow such an importing of data. The new limitations allow the intermediate form to serve as a conduit between a source system and a target system, while providing the advantages of the claimed conversion process. In other words, the claimed intermediate form recognizes the employee position field in the target form (to which the employee position data is expected to be imported). The claimed intermediate form also recognizes the employee position data in the source form (from which the employee position data is to be extracted). A consequence of the claimed structure and operation of the elements is that the target system is not merely a blank slate into which converted data is simply dumped. The target system is linked to the source system, as a result of the target system having defined an employee position field. Thus, the target system expects this field to be populated – however, the data which will populate the field resides on the source system, and so needs to be imported via the “conduit” provided by the intermediate form. This type of link between the target system and the source system, with the intermediate form serving as a conduit, is absent from all of the cited references, taken alone or in any permissible combination.

The existence of the link between the source system and the target system is apparent when the example systems from the Specification are considered. The Specification presents an embodiment where the source system is a Human Resources Management (HRM) system and the target system is an Employee Resources Management (ERM) system. Both the HRM and ERM systems pertain to employee position information, however, the ERM is more focused on managing employee data and the HRM is more focused on maintaining an organizational hierarchy. Because the ERM and HRM systems are so related, the employee data maintained by each naturally fits together. This fit between the two systems is captured within the claimed method and by the structure of the source form and the target form.

The Office Action cites ¶¶ [0871]-[0873], [0880], [0170], [1209], and [0857]-[0858] as purportedly teaching the claimed “extracting ... information in a first form.” Office Action, p. 4. These sections of Mui purportedly disclose the claimed intermediate form. While not cited, paragraph [0855] of Mui presents an Interchange Format that is a “universal representation used

for exchange between systems.” This Interchange Format is further discussed in the cited sections of Mui. However, no cited section of Mui teaches or suggests that a source system with a data element and a target system with a data field into which the data element is to be imported. Mui simply presents a system with a traditional understanding of exchanging data between two systems: data from a first system is converted and sent to a second system – without any implicit or explicit correlation of any kind between data in the first system format and a data field in the second system format. None of the cited sections of Mui suggest that Mui’s Interchange Format is aware or capable of importing data from a first system to a data field in a second system. A straightforward conversion of data as in Mui fails to capture this feature (and others) of the claimed method.

One of skill in the art would have no basis for extrapolating from whatever teachings Mui might be said to provide, in an attempt to show, teach or suggest the claimed invention, at least because Mui is silent regarding any concepts remotely comparable to a first form with employee position data as claimed, an intermediate form that allows for the importing of data as claimed, a target form with an employee position field as claimed, and the importing of data from the employee position data into the employee position field, as claimed. In other words, without any suggestion of a link between the data on one system to a data field on a second system, an ordinary artisan would have no basis for adding such an incongruous feature to Mui’s conversions.

The Office Action introduced Peterson to purportedly teach “a method for transferring information between first and second systems with dissimilar first and second database structures.” Office Action, p. 7, citing Peterson 3:15-29. However, as with Mui, Peterson is silent with regard to the new limitations of Claims 1, 10, and 19.

Peterson purportedly converts data between two dissimilar systems, however this purported conversion fails to show, teach or suggest anything like the claimed conversion. Peterson purportedly teaches a conversion server that lies between two systems, there is no suggestion that anything like an intermediate form is used. In other words, Peterson’s conversion server simply performs a direct conversion between two systems. Given Peterson’s goal of simply offloading the conversion process from the end systems, the lack of an intermediate form is not surprising. *See* Peterson 2:40-43 (“A need therefore exists for a system architecture which

can allow the transmission of data between dissimilar systems while minimizing the associated load imposed on the host system CPU.”).

Also similar to Mui, Peterson’s concept of conversion is in line with the traditional understanding of conversions: taking data compatible with a first system and changing that data to be compatible with a second system. Such a traditional understanding of a conversion of data fails to teach or suggest the claimed combination of employee position data in a source form, an employee position field in a target form, and the importing of the employee position data into the employee position field via an intermediate form configured to allow such an importing of data.

Thus, similar to Mui, there is no reason that an ordinary artisan would have for attempting to extend Peterson in any regard, at least given Peterson’s silence regarding the new limitations. It would be unreasonable to expect a particular outcome from an ordinary artisan when the artisan is given such a blank slate.

Further, regardless of the manner in which the teachings of the cited references are characterized and/or combined, there is simply no showing, teaching or suggestion regarding the combination of the claimed conversion technique and importing operations. In order for the claimed invention to make employee position data on the source system available to the target system, the claimed invention not only transfers data from a known location in the source system to a known location in the target system, but also performs a conversion of the information from the source system (in the source form) into the intermediate form, and then converts the information in the intermediate form into the target form. In so doing, the claimed invention is not only able to ensure that the requisite employee position data ends up in the proper location in the target system (and so is in the expected location therein), but also that such information is in a form that is compatible with the target system (and so is in the form expected by the target system). The claimed invention’s ability to provide inter-system access to information in an appropriate form is not only not taught by the cited references, it is a solution, unrecognized by the cited references, to a problem to which the cited references are utterly oblivious.

For at least these reasons, Applicants submit that neither Mui nor Pederson nor Kurzius, taken alone or in combination, provide disclosure of the limitations of independent Claims 1, 10, 19, and all dependent claims. Applicants therefore respectfully request the Examiner’s reconsideration and withdrawal of the rejections to these claims and an indication of the allowability of same.

CONCLUSION

In view of the amendments and remarks set forth herein, this Application is believed to be in condition for allowance and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5084.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicants hereby petition for such extensions. Applicants also hereby authorize that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to deposit account 502306.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'S. G. Campbell III', with a stylized flourish at the end.

Samuel G. Campbell III
Attorney for Applicant(s)
Reg. No. 42,381
Telephone: (512) 439-5084
Facsimile: (512) 439-5099